

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

H.D. YORSTON, on Behalf of Himself and All  
Others Similarly Situated,

Plaintiff,

v.

EPIX PHARMACEUTICALS, INC.,  
MICHAEL D. WEBB, PEYTON J.  
MARSHALL and ANDREW UPRICHARD,

Defendants.

No. 1:05-cv-10166-PBS

ROBERT GREENE, Individually and On Behalf  
of All Others Similarly Situated,

Plaintiff,

v.

EPIX PHARMACEUTICALS, INC.,  
formerly known as EPIX Medical, Inc.,  
MICHAEL D. WEBB, PEYTON J.  
MARSHALL and ANDREW UPRICHARD,

Defendants.

No. 1:05-cv-10194-WGY

*[Captions Continue on Following Page]*

**MOTION OF THE DISCIPLINED GROWTH INVESTORS GROUP FOR  
CONSOLIDATION OF RELATED ACTIONS, FOR APPOINTMENT AS  
LEAD PLAINTIFF AND FOR APPROVAL OF LEAD PLAINTIFF'S  
SELECTION OF LEAD COUNSEL**

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JOHN C. JOHNSON JR., JOHN C.  
JOHNSON JR. TARGET BENEFIT  
PENSION, JEFFREY S. JOHNSON and  
JOHN C. JOHNSON JR. DEFINED  
BENEFIT PENSION PLAN, Individually and  
On Behalf of All Others Similarly Situated,

Plaintiff,

v.

EPIX PHARMACEUTICALS, INC., formerly  
known as EPIX Medical, Inc., MICHAEL D.  
WEBB, PEYTON J. MARSHALL and  
ANDREW UPRICHARD,

Defendants.

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No. 1:05-cv-10272-GAO

DORAVILLE MANAGEMENT II CORP.  
by Donald Ramirez, President on Behalf of  
Himself and All Others Similarly Situated,

Plaintiff,

v.

EPIX PHARMACEUTICALS, INC.,  
MICHAEL D. WEBB, PEYTON J.  
MARSHALL and ANDREW UPRICHARD,

Defendants.

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1:05-cv-10288-PBS

*[Captions Continue on Following Page]*

STANLEY A. KIM, On Behalf of Himself and  
Others Similarly Situated,

Plaintiff,

v.

EPIX PHARMACEUTICALS, INC.,  
MICHAEL D. WEBB, PEYTON J.  
MARSHALL and ANDREW UPRICHARD,

Defendants.

No. 1:05-cv-10315-PBS

YALE TOLWIN, on Behalf of Himself and All  
Persons Similarly Situated,

Plaintiff,

v.

EPIX PHARMACEUTICALS, INC.,  
MICHAEL D. WEBB, PEYTON J.  
MARSHALL and ANDREW UPRICHARD,

Defendants.

No. 1:05-cv-10388-PBS

**TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE, that Disciplined Growth Investors, Inc. and Compass Investors Limited Partnership (the “Disciplined Growth Investors Group” or “Movants”) hereby move this Court, (1) under §§21(D) *et seq.* of the Securities Exchange Act of 1934 as amended by the Private Securities Litigation Reform Act of 1995 (“PSLRA”), for an order (a) appointing the Disciplined Growth Investors Group as Lead Plaintiff; (b) approving Movants’ selection of Glancy Binkow &

Goldberg LLP as Lead Counsel for the Class; and (c) approving Movants' selection of Moulton & Gans, P.C. as Liaison Counsel for the Class..

This motion is brought pursuant to the Securities Exchange Act of 1934, the Federal Rules of Civil Procedure and the PSLRA.

This motion is based on the attached memorandum of points and authorities, the declaration of John C. Martland and the Court's complete files and records in these actions, as well as such further argument as the Court may allow at a hearing on this motion.

A copy of this motion has been sent to all parties on the attached proof of service.

Respectfully submitted,

Dated: March 28, 2005

**MOULTON & GANS, P.C.**

/s/ Nancy Freeman Gans

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***Proposed Liaison Counsel***

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***Proposed Lead Counsel***

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**MURRAY, FRANK & SAILER LLP**

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Facsimile: (212) 682-1892

*Counsel for Plaintiffs*

**LOCAL RULE 7.1(A)(2) CERTIFICATE**

I, Nancy Freeman Gans, hereby certify that on March 28, 2005, I spoke with Adam L. Sisitsky, Esquire, Mintz Levin Cohn Ferris Glovsky & Popeo, PC, counsel for all defendants, regarding the within Motion. Mr. Sisitsky consents to the Motion for Consolidation, and I have notified him that the Motion for Appointment as Lead Plaintiff is required by statute.

/s/ Nancy Freeman Gans  
Nancy Freeman Gans

**CERTIFICATE OF SERVICE**

I, Nancy Freeman Gans, hereby certify that a true copy of the above document was served upon the attorney of record for each party on March 28, 2005.

/s/ Nancy Freeman Gans  
Nancy Freeman Gans